

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN**

BRYAN ROBBINS, on behalf of himself, all others similarly situated, and the general public,

Plaintiffs,

v.

THE COCA-COLA COMPANY, a Delaware Corporation,

Defendant.

Miscellaneous Case

Case No.: 2:14-mc-50538-MFL-DRG

Lead Case Pending in the Southern District of California Civil Action No.: 3:13-cv-00132-JLS-WVG

**JOINT STATUS REPORT  
REGARDING PLAINTIFF'S  
MOTION TO ENFORCE  
SUBPOENAS ON  
HELLOWORLD, INC.**

Plaintiff Bryan Robbins, Defendant The Coca-Cola Company (“Coca-Cola” or Defendant”) and third party HelloWorld, Inc (“HelloWorld”), through undersigned counsel, respectfully submit the following Joint Status Report Regarding Plaintiff’s Motion to Enforce Subpoenas on HelloWorld, Inc.

On May 20, 2014, this Court held a telephone status conference regarding Plaintiff’s Motion to Enforce Subpoenas on HelloWorld, Inc. in front of the Honorable Avern Cohn. During the conference this Court ordered that HelloWorld conduct a reasonable search of its record for the number of Plaintiff Bryan Robbins. Additionally, the Court provided that Plaintiff may conduct a Fed. Rule

of Civ. Proc. 30(b)(6) deposition in regard to HelloWorld's search. This Court provided the parties with a deadline of one month.

On June 11, 2014, the Southern District of California issued an order in the lead case, *Robbins v. Coca-Cola Company*, 13-CV-0132-JLS (WVG) ("Robbins"), stating, “[a]s ordered by the Eastern District of Michigan, all remaining discovery from HelloWorld shall be produced by June 19, 2014, and the deposition of HelloWorld's Rule 30(b)(6) witness must be completed on or before June 19, 2014.” *See* Robbins Dkt. No. 65.

In compliance with this Court's order, on June 13, 2014, HelloWorld provided Plaintiff's counsel with 1) an Affidavit of Sagar Parvataneni, which purported to reflect the results of the search of the incoming and outgoing calls related to the phone number of Plaintiff and Plaintiff himself, 2) a copy of the Master Services Agreement between HelloWorld, Inc. and Coca-Cola that has been in effect since January, 2011, and 3) a copy of the retention policies of HelloWorld, Inc. that have been in effect since January, 2011. On June 16, 2014, Plaintiff conducted a Fed. R. Civ. Proc. 30(b)(6) deposition and deposed Sagar Parvataneni in regard to his search and affidavit. No further issues remain.

Dated: June 30, 2014

Respectfully submitted,

By: /s/ Perrin Rynders  
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Dated: June 30, 2014

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Dated: June 30, 2014

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